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MORRISON & FOERSTER LLP
Jamie A. Levitt
Damion K.L. Stodola
1290 Avenue of the Americas
New York, NY 10104-0050
(212) 468-8000

Attorneys for Plaintiff Verified Identity Pass, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VERIFIED IDENTITY PASS, Inc., d/b/a CLEAR
REGISTERED TRAVELER,

Plaintiff,

-against-

FRED FISCHER, SAFLINK CORPORATION, and
FLO CORPORATION,

Defendants.

No. 07 Civ. 6538 (JGK)

**NOTICE OF MOTION FOR
ADMISSION OF COUNSEL
*PRO HAC VICE***

PLEASE TAKE NOTICE that, pursuant to Rule 1.3(c) of the Rules of the United States District Courts for the Southern and Eastern Districts of New York, and upon the accompanying Declaration of Damion K.L. Stodola, dated July 26, 2007, and the accompanying Declaration of Lori A. Schechter, dated July 25, 2007, plaintiff Verified Identity Pass, Inc. moves this Court for the admission *pro hac vice* of attorney Lori A. Schechter.

Dated: New York, New York
July 26, 2007

MORRISON & FOERSTER LLP

By: *Damion Stodola*
Jamie A. Levitt
Damion K.L. Stodola

1290 Avenue of the Americas
New York, NY 10104-0050
(212) 468-8000

*Attorneys for Plaintiff Verified Identity
Pass, Inc.*

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VERIFIED IDENTITY PASS, Inc., d/b/a CLEAR
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Plaintiff,

-against-

FRED FISCHER, SAFLINK CORPORATION, and
FLO CORPORATION,

Defendants.

No. 07 Civ. 6538 (JGK)

**DECLARATION OF
DAMION K.L. STODOLA IN
SUPPORT OF MOTION FOR
ADMISSION OF LORI A.
SCHECHTER *PRO HAC*
*VICE***

DAMION K.L. STODOLA declares pursuant to 28 U.S.C. § 1746 the following:

1. I am a member of the law firm of Morrison & Foerster LLP, 1290 Avenue of the Americas, New York, New York, counsel of record in this action for plaintiff Verified Identity Pass, Inc. ("Verified") in this action. I am admitted to practice before the U.S. District Court for the Southern District of New York and remain in good standing therein. I submit this declaration in support of Verified's motion for an order granting the admission of Lori A. Schechter of Morrison & Foerster LLP as Verified's co-counsel of record.

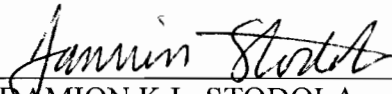
2. I am familiar with Ms. Schechter as she is a partner of Morrison & Foerster LLP, with offices located at 425 Market Street, San Francisco, California 94105. I believe her to be an attorney of good character, competence, and experience.

3. In support of this application is the Declaration of Ms. Schechter describing her bar membership and good standing in the State Bar of California.

4. For the Court's convenience, a copy of the proposed order granting this application is annexed hereto as Exhibit A.

WHEREFORE, Declarant respectfully requests that this Court issue an Order admitting Lori A. Schechter of Morrison & Foerster LLP *pro hac vice* in this action on behalf of Verified, together with such other and further relief as to the Court shall deem just and proper.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 26th day of July, 2007, in New York, New York.


DAMION K.L. STODOLA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VERIFIED IDENTITY PASS, Inc., d/b/a CLEAR
REGISTERED TRAVELER,

Plaintiff,

-against-

FRED FISCHER, SAFLINK CORPORATION, and
FLO CORPORATION,

Defendants.

No. 07 Civ. 6538 (JGK)

**[Proposed] ORDER FOR
ADMISSION OF COUNSEL
LORI A. SCHECHTER *PRO*
*HAC VICE***

Came on this day for consideration is the Motion to Appear *Pro Hac Vice* of
Movant, Lori A. Schechter of Morrison & Foerster LLP, for purposes of the above-
entitled and numbered cause. After careful consideration, the Court is of the opinion
that said motion should be GRANTED. It is accordingly ORDERED that Lori A.
Schechter shall be allowed to appear before this Court *pro hac vice*, subject to the
Local Rules of the Southern District of New York.

Signed this ____ day of _____, 2007

UNITED STATES DISTRICT COURT JUDGE

MORRISON & FOERSTER LLP
Jamie A. Levitt
Damion K.L. Stodola
1290 Avenue of the Americas
New York, NY 10104-0050
(212) 468-8000

Attorneys for Plaintiff Verified Identity Pass, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VERIFIED IDENTITY PASS, Inc., d/b/a CLEAR
REGISTERED TRAVELER,

Plaintiff,

-against-

FRED FISCHER, SAFLINK CORPORATION, and
FLO CORPORATION,

Defendants.

Civ. No. 07 Civ. 6538

**DECLARATION OF LORI A.
SCHECHTER IN SUPPORT
OF MOTION FOR
ADMISSION OF COUNSEL
*PRO HAC VICE***

LORI A. SCHECHTER declares pursuant to 28 U.S.C. § 1746 the following:

1. I am a member of the law firm of Morrison & Foerster LLP, 425 Market Street, San Francisco, California 94105, and am counsel for Verified Identity Pass, Inc., (“Verified”) in this action.
2. I submit this declaration in support of Verified’s Motion for Admission of Counsel *Pro Hac Vice* in connection with this action pursuant to Local Civil Rule 1.3(c) of this Court.
3. I have been admitted to practice in California since June 6, 1989, and I am currently in good standing in the State Bar of California. A certificate of good standing from the State Bar of California is annexed hereto as Exhibit A.

4. I will faithfully adhere to all rules applicable to my conduct in connection with any activities of this Court.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 25th day of July, 2007, in San Francisco, California.

A handwritten signature in cursive script, reading "Lori A. Schechter", is written over a horizontal line.

Lori A. Schechter



THE
STATE BAR
OF CALIFORNIA

180 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105-1639
TELEPHONE (415) 538-2000

July 19, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, LORI ANN SCHECHTER, #139728 was admitted to the practice of law in this state by the Supreme Court of California on June 6, 1989; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

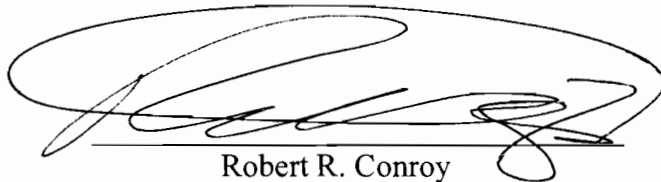
THE STATE BAR OF CALIFORNIA

Kath Lambert
Custodian of Membership Records

Certificate of Service

I, Robert R. Conroy, hereby certify that on July 26, 2007, I caused a true and correct copy of the foregoing NOTICE OF MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE, DECLARATION OF DAMION K.L. STODOLA IN SUPPORT OF MOTION FOR ADMISSION OF LORI A. SCHECHTER PRO HAC VICE, DECLARATION OF LORI A. SCHECHTER IN SUPPORT OF MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE and PROPOSED ORDER ADMITTING COUNSEL PRO HAC VICE, to be served by messenger on the following:

Stanley McDermott, III, Esq.
DLA Piper Rudnick US LLP
1251 Avenue of the Americas
New York, NY 10020-1104

A handwritten signature in black ink, appearing to read 'Robert R. Conroy', is written over a horizontal line. The signature is stylized with a large, sweeping initial 'R' and a long, horizontal stroke that extends to the right.

Robert R. Conroy